

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA
ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR-PHK

MDL No. 3047

**STIPULATION REGARDING [PROPOSED]
THIRD MODIFIED PROTECTIVE ORDER**

This Document Relates to:

ALL SCHOOL DISTRICT ACTIONS

WHEREAS, this Court entered the Stipulated Second Modified Protective Order on March 4, 2024. (Dkt. No. 665).

WHEREAS, after hearing arguments from both sides at a Discovery Management Conference on September 12, 2024 (“DMC”), the Court ordered that the parties meet and confer to address production of documents and materials under The Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g, and its implementing regulations (34 C.F.R. part 99).

WHEREAS, the parties met and conferred following the DMC and modified the Stipulated Second Modified Protective Order to include a new “Section 14. Redactions or Designations of Highly Confidential (SII) – Attorneys’ Eyes-Only Material (Educational Records Containing Student Individually Identifiable Information),” and other related modifications to Sections 2.7, 2.18, 2.20, 2.23, 5.1, 5.5, 7.3, 7.5, 7.6, 8.1, and 8.3. A redline copy comparing the parties’ Proposed Stipulated Third Modified Protective Order to the Stipulated Second Modified Protective Order is attached here as **Exhibit A** for the Court’s reference.

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1 **NOW WHEREFORE, IT IS HEREBY STIPULATED** by and between the parties
2 through their respective attorneys of record that the entry of the proposed Third Modified
3 Protective Order, attached as **Exhibit B**, will assist in facilitating and expediting the
4 production of certain documents and materials in school district cases.

5
6 DATED: October 4, 2024

Respectfully submitted,

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ATTESTATION

I, Geoffrey M. Drake, hereby attest, pursuant to N.D. Cal. Civil L.R. 5–1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: October 4, 2024

By: /s/ Geoffrey M. Drake
Geoffrey M. Drake